NOTICE OF MOTION AND MOTION TO QUASH SUBPOENA

Clerk, US District Court COURT 4612

22

23

24

25

26

27

28

To: Plaintiff Verisign, Inc. and to its attorneys of record 1 PLEASE TAKE NOTICE that Defendants XYZ.com LLC and Daniel Negari 2 will, and hereby do, move the Court under Rule 45 of the Federal Rules of Civil 3 Procedure for an order quashing the June 5, 2015 subpoena served by Plaintiff 4 Verisign, Inc. to Elias Aziz-Lavi, CPA, Defendants accounting firm. The subpoena 5 was issued in connection with an action that is pending in the Eastern District of 6 Virginia, Verisign, Inc. v. XYZ.com, LLC et al., Case No. 1:14-cv-01749. 7 This Motion is based on this Notice of Motion and Motion, the supporting 8 Memorandum of Points and Authorities, the declarations of Daniel Negari, Elias 9 Aziz-Lavi, and Derek Linke filed herewith, the pleadings and papers on file in this 10 action, such matters of which the Court may take judicial notice, and files and other 11 matters that may be presented at the hearing. 12 13 14 Dated: June 17, 2015. Respectfully Submitted, 15 Newman Du Wors LLP 16 17 By: s/ Derek Linke 18 Derek A. Newman, State Bar No. 190467 dn@newmanlaw.com 19 Derek Linke, State Bar No. 302724 20 linke@newmanlaw.com 21 Attorneys for Defendants XYZ.com, LLC and Daniel Negari 22 23 24 25 26 27 28 NOTICE OF MOTION AND MOTION TO QUASH SUBPOENA